

To: File
From: John Legg
Date: March 7, 2017

John Legg
3/7/17

Subj: Class II Administrative Update (to R13-1645A)

Campbell Transportation Company, Inc. (CTC)
Congo Plant - Newell, Hancock County, WV
Company ID No.: 029-00033
Permit ID No.: R13-1645B

Timing

The application was stamped in at the DAQ on December 22, 2016. The legal advertisement ran on December 26, 2016 in *The Weirton Daily Times*. The \$300.00 application fee was paid on January 3, 2017, and that same day the writer was assigned as the reviewing engineer. On January 4, 2017 the affidavit of publication was received at the DAQ. On February 8, 2017 Attachments F (Process Flow Diagram) and G (Process Description) were received via email, and that same day the application was deemed complete. The 60-day review period for the application will end on April 10, 2017.

Current Facility NAICS Codes

483211 - Inland Water Freight Transportation
488320 - Marine Cargo Handling
336611 - Ship Building and Repairing
562998 - All Other Miscellaneous Waste Management Services

Proposed Changes

- CTC proposes revisions to the permit terms in section 4.1.1 and Table 4.1.1 thus allowing CTC to clean barges containing additional materials that are not currently listed in R13-1645A: **Heavy and Light Aromatics**; **Benezene & Benzene Mixes**; **Cresols (creosote and other cresols)**; **Glycols (ethylene glycol, propylene glycol, polyethylene glycol, triethylene glycol, and other glycols)**; **Hexanes (n-hexane, other hexanes)**; **Natural Gas**; **Refined Chemical Oils**; and **Styrenes**.

The following MSDS were submitted in Attachment H: Base Oil Stocks; Blend Oils; Ethylene Glycol; Exxal 10; n-Hexane; Palatinol; Piperylene; Stack Wax; and Vegetable Oils.

- The proposed changes to the Odor Control Program in sections 4.1.2 and 4.1.3 are requested in order to allow CTC to clean barges more safely and efficiently while still controlling objectionable odors.

- CTC requests changes to existing permit sections 4.1.1 and 4.4.4 to clarify that only barges cleaned at the facility, not just docked or unloaded at the facility, are subject to the odor control program and its recordkeeping requirements.
- CTC is voluntarily reducing the limit on maximum annual hours of vapor combustion at the flare (FL-1) from 936 hours per year to 500 hours per year, and is requesting reduced annual emission limits in permit section 4.1.4.

Emission Calculations

The writer reviewed CTC's emission calculations and found them to be correct.

Table 1: Annual Emissions Decreases (TPY) Resulting from Limiting Vapor Combustion Using the Flare (FL-1) from 936 to 500 hours per year.			
Pollutant	Before	After	Delta
	(TPY)	(TPY)	Before - After (TPY)
PM/PM10/PM2.5	0.19	0.10	0.09
NO _x	1.70	0.90	0.80
CO	9.18	4.90	4.28
VOC	1.56	0.83	0.73
(1) After (TPY) = 500/936 * Before (TPY).			

Changes Made to Previous Permit (R13-1645A)

The changes made to R13-1645A to become R13-1645B are detailed in Attachment 1 to this evaluation.

Attachment 1

**Changes Made
to Permit R13-1645A
to Become Permit R13-1645B**

Campbell Transportation Compnay, Inc.

**2567 Congo Arroyo Road
Newell, WV 26050**

West Virginia Department of Environmental Protection
Earl Ray Tomblin *Randy C. Huffman*
Jim Justice *Division of Air Quality* *Austin Caperton*
Governor *Cabinet Secretary*

Permit to ~~Modify~~ Update



R13-~~1645A~~1645B

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§22-5-1 et seq.) and 45 C.S.R. 13 – Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the above-referenced facility is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:
~~C & C Marine Maintenance~~ Campbell Transportation Company, Inc.
Congo Plant/Newell
029-00033

~~John A. Benedict~~
William F. Durham
Director

Issued: ~~December 29, 2011~~ March 7, 2017

This permit will supersede and replace Permit R13-~~16451645A~~.

Facility Location: Newell, Hancock County, West Virginia

Mailing Address: Foxpointe Centre, Building One

201 S. Johnson Road, Suite 303

Houston, PA 15342-1351

Facility Description: Marine Maintenance to include cleaning of tanker barges.

NAICS Codes: ~~488310, 488330,~~ 483211, ~~488390,~~ 488320, 336611, and 562998

UTM Coordinates: 530.9 km Easting • 4,495.3 km Northing • Zone 17

Permit Type: ~~Modification~~Class II Administrative Update

Description of Change: ~~Construction of vapor collection system which includes a flare as the control device~~Revisions to Table 4.1.1. Approved Materials List and Odor Control Program

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §§22-5-14.

As a result of the granting of this permit, the source is a nonmajor source subject to 45CSR30. The facility is not subject to the permitting requirements of 45CSR30 and is classified as deferred source.

2.3. Authority

This permit is issued in accordance with West Virginia air pollution control law W.Va. Code §§ 22-5-1. et seq. and the following Legislative Rules promulgated thereunder:

- 2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;*

2.4. Term and Renewal

- 2.4.1. This permit supersedes and replaces previously issued Permit R13-~~1645~~1645A. This Permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any other applicable legislative rule;

2.5. Duty to Comply

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-1645, R13-1645A, R13-1645B, and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;
[45CSR§§13-5.11 and -10.3.]
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses, and/or approvals from other agencies; i.e., local, state, and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

1. The permit or rule evaluated, with the citation number and language;
2. The result of the test for each permit or rule condition; and,
3. A statement of compliance or noncompliance with each permit or rule condition.

[WV Code § 22-5-4(a)(14-15) and 45CSR13]

3.4. Recordkeeping Requirements

- 3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports, and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.
- 3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
[45CSR§4. State Enforceable Only.]

3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- 3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
- 3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class or by private carrier with postage prepaid to the address(es), or submitted in electronic format by email as set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

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~~If to the~~ DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street
Charleston, WV 25304-2345

~~DAQ Compliance and Enforcement~~¹:

~~DEPA~~airQualityReports@wv.gov

~~If to the~~ US EPA:

Associate Director
Office of ~~Air~~ Enforcement and ~~Permits~~
~~Review~~Compliance Assistance
(3AP123AP20)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

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¹For all self-monitoring reports (MACT, GACT, NSPS, etc.), stack tests and protocols, Notice of Compliance Status Reports, Initial Notifications, etc.

3.5.4. Operating Fee

3.5.4.1. In accordance with 45CSR30 – Operating Permit Program, the permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

4.0. Source-Specific Requirements

4.1. Limitations and Standards

- 4.1.1. The odor control program shall be used when cleaning barges containing the materials listed in Table 4.1.1., which are denoted as being subject to the Odor Control Program. Barges that are unloaded, but not cleaned, are not subject to the Odor Control Program.

Table 4.1.1. Approved Materials List			
Materials Cleaned	Odor Control Program	Flared	Neither
2-Ethyl Hexanol	X	X	
Acetone	X	X	
Aromatics (100, 150 and 200) - Heavy	X	X	
Aromatics - Light	X		
Base Oil Stocks			X
Benzene & Benzene Mixes	X	X	
Blend Oils			X
Butyl Acrylate	X		
Caustic Soda			X
Chlorine Liquid			X
Coal Tar Distillates	X		
Coal Tar Light Oil	X	X	
Cresols (creosote and other cresols)	X		
Crude Coal Tar	X		
Crude Oil	X	X	
Cumene	X	X	
Diesel	X		
Ethyl Alcohol	X		

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Table 4.1.1. Approved Materials List			
Materials Cleaned	Odor Control Program	Flared	Neither
Exxal 10	X		
Gasoline	X	X	
Glycols (ethylene glycol, propylene glycol, polyethylene glycol, triethylene glycol, and other glycols)	X		
Heavy Oils	X		X
Hexanes (n-hexane, other hexanes)	X		
Inorganic Acids			X
Isodecyl Alcohol	X		
Isononyl Alcohol	X		
Isopropyl Alcohol	X		
Kerosene	X		
Ketones	X	X	
Lube Oils, Base Stocks, Slack Wax	X		
Methanol	X	X	
Methyl Ethyl Ketone	X	X	
Mineral Spirits	X		
Naphtha	X		
Naphthalene	X		
Natural Gas	X		
Oil Distillates	X		
Palatinol	X		
Paraffin Wax			X

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Table 4.1.1. Approved Materials List			
Materials Cleaned	Odor Control Program	Flared	Neither
Petroleum Distillates	X		
Raffinate	X	X	
Refined Chemical Oils	X		
Resin Oil	X	X	
StyreneSlack Wax	X	X	X
Styrenes	X		
Toluene	X	X	
Vegetable Oils			X
Xylene	X	X	

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- 4.1.2. When cleaning barges containing the material subject to the Odor Control Program as denoted in Table 4.1.1, ~~the only hatch that a vacuum truck will be opened is on the compartment from which free product is being removed, or which is being actively cleaned, in order~~ used as a knockout to sustain the flare, a safety barrier and to minimize the amount of material vented to the atmosphere. For cargoes not requiring the use of a flare, but needing odor control, the following process will be used:

- Compartment containing cargoes will be stripped with tank hatches closed through a vacuum truck. Depending on the characteristics of the cargo and as needed, cold or hot water wash will be used to back flush out cargo residues (i.e., pipelines, deep wells, and sumps) that may create vapors and stripped using a vacuum truck.
- Once the barge has been "washed" the barge will rest for 10-12 hours with pipe valves and vent stack(s) partially opened to allow for low air flow. After the resting period, continuous monitoring for cargo vapor will be done and slow rate blowers will be used to begin the drying process. Any excess cargo wash water found will be removed using the vacuum truck with hatches open.
- If cargo vapors causing odor are detected then the process of closing the barge, washing and resting will be conducted again to minimize vapor/odor release.

- 4.1.3. In addition to the requirement of 4.1.2., the following work practices must be followed when cleaning barges that contain materials whose vapor will be flared as denoted in Table 4.1.1.:

- ~~Once~~ After the first compartment has been determined to be empty of free liquids and the sump has been stripped, the remaining vapors in that compartment shall be controlled by use of a flare.
- ~~A vacuum truck will be connected to the barge's cargo line. The flare stack blower shall will be hooked-upconnected to a barge compartment through one of the compartment's openingsvacuum truck.~~

- c. All flammable vapors shall be flared until the flare can no longer maintain combustion as evidenced by visual observation for the presence of a flame at the flare stack opening. Once vapors within a compartment's opening are purged to a level that will no longer support combustion, the flaring process will cease for that compartment.
 - d. This process will be repeated for each compartment within each barge that contains materials whose vapors will be flared as denoted in Table 4.1.1.
 - e. Once the flaring is complete for a barge compartment, the hatches for that compartment will be opened and mechanical ventilation will be used for the purpose of employee safety prior to commencing barge compartment cleaning operations.
- 4.1.4. The permittee shall install, maintain, and operate a vapor collection system (VCS) with vapor destruction unit (air-assisted flare FL-1) to control emissions from barges undergoing gas-freeing activities (degassed) for cleaning activities, when cleaning barges containing the materials subject to flaring as denoted in Table 4.1.1.

- a. Emissions from the flare (FL-1) shall not exceed any of the limits in Table 4.1.4.a.

Table 4.1.4.a. Emission Limits from the Flare		
Pollutant	Emission Rate	
	lb/hr	TPY
PM/PM ₁₀ /PM _{2.5}	0.40	0.1910
NO _x	3.6	1.790.90
CO	19.6	9.184.90
VOCs	3.34	1.560.83

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- b. The maximum hourly flow rate of effluent to be flared by FL-1 shall not exceed 850 cfm at standard conditions;
 - c. The maximum annual hours of vapor combustion at the flare shall be limited to 936500 hours per year. This annual limit corresponds to the annual emission limits in Table 4.1.4.a.
 - d. The flare shall not exhibit visible emissions of 20 % opacity or greater to the atmosphere. [45CSR§6-4.3]
 - e. The flare (FL-1) is permitted to smoke which is less than forty percent (40%) opacity, for a period or periods aggregating no more than eight (8) minutes per start-up. [45CSR§6-4.34]
- 4.1.5. The permittee shall not clean more than six (6) barges per year containing cumene.

4.4.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.

4.4.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

- a. The equipment involved.
- b. Steps taken to minimize emissions during the event.
- c. The duration of the event.
- d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

- e. The cause of the malfunction.
- f. Steps taken to correct the malfunction.
- g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

4.4.4. The permittee shall keep the following records for each barge that ~~deekis cleaned~~ at the facility and is subject to an odor control program in accordance with Condition 4.1.1:

- a. Identification number of the barge;
- b. Record of the contents;
- c. Date and time that the barge cleaning began and finished;
- d. Name of the crew leader during the cleaning;

Such records shall be maintained in accordance with Condition 3.4.1.

4.5. Reporting Requirements

4.5.1. The permittee shall notify the Director or his/her duly authorized representative within 72 hours of receiving an air quality related complaint from the public. Such notification can be made by verbal, electronic, or written means and contain the following information:

- a. Date and time the complaint was received;
- b. Date and time the air quality event occurred; and
- c. Nature of the complaint.